

1 Bountiful Law, PLLC
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6 IN THE UNITED STATES BANKRUPTCY COURT
7 FOR THE WESTERN DISTRICT OF WASHINGTON

8 In re:

Chapter 11

9 V.S. INVESTMENT ASSOC., LLC,

10 NO. **20-11541**

11 EX PARTE APPLICATION FOR
12 ORDER AUTHORIZING
13 EMPLOYMENT OF
14 BOUNTIFUL LAW, PLLC AS LEGAL
15 COUNSEL FOR THE ESTATE

16 Debtor(s).

17
18 V.S. Investment Assoc., LLC., the debtor-in-possession ("Debtor") in this Chapter 11
19 case apply to this Court, pursuant to 11 U.S.C. Section 1103, for an order authorizing the
20 employment of Bountiful Law, PLLC as legal counsel for the estate.

21 In support of this application, the Debtor respectfully represents:

22 1. On May 29th, the Debtor filed a voluntary petition under Chapter 11 of
23 Title 11 of the United States Code.

24 2. The Debtor seeks authority to appoint Bountiful Law, PLLC as legal counsel for

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26 Application to Employ

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the estate of the case referenced above. Attached to this Application are copies of the Engagement Letter marked as Exhibit “A”.

3. The professional services that Bountiful Law, PLLC will render include:

- a. Assisting the Debtor in the investigation of the financial affairs of the estate;
- b. Providing legal advice and assistance to the Debtor with respect to matters relating to this case and creditor distribution;
- c. Preparing all pleadings necessary for proceedings arising under this case; and
- d. Performing all necessary legal services for the estate in relation to this case.

4. Bountiful Law, PLLC will charge its standard rate, more specifically rendered will be billed at: \$350.00 per hour for Lawrence Blue, \$300.00 per hour for Brad Puffpaff, \$200.00 per hour for contract attorneys, \$125.00 an hour for paralegal fees, and legal secretary fees at \$75.00 an hour for services rendered and will seek reimbursement for costs and expenses incurred in relation to representation of the estate.

5. As stated in the concurrently filed Declaration of Brad L. Puffpaff, Bountiful Law, PLLC believes that it and its attorneys (a) do not hold or represent any interest adverse to the interests of the estate, and (b) are disinterested persons within the meaning of 11 U.S.C. Section 101.

6. Bountiful Law, PLLC received a combined \$8,000.00 retainer from V.S. Investments Assoc., LLC., that is currently held in trust, to pay for post-petition services. The funds will be applied only after the approval of a fee application following notice and a hearing. Subject to Court approval, the Debtor may augment the amount held in trust as necessary to pay ongoing fees as approved by the Court. Bountiful Law, PLLC will submit further interim and

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1 final applications for compensation and reimbursement in accordance with all orders of the Court
2 and other applicable laws and rules.

3 7. Bountiful Law, PLLC does not hold a pre-petition claim against the Debtor, and
4 does not hold an administrative claim for the bankruptcy preparation performed immediately
5 prior to filing.
6

7 8. This application is supported by the Declaration of Brad L. Puffpaff filed
8 herewith.

9 BASED on the foregoing, the Debtor respectfully requests the Court's authorization to
10 appoint and employ Bountiful Law, PLLC as interim counsel for the estate, subject to approval
11 of any post-petition retainers and subject to final approval of the application after notice and a
12 hearing.
13

14 Dated this 10th day of June 2020.

15 V.S. Investment Assoc., LLC.

16 /S/ Valentin Stelmakh
17 Valentin Stelmakh, Member

18 Submitted by:

19 /s/ Brad L. Puffpaff
20 WSBA No. 46434
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25

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